

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re CHINA NORTH EAST PETROLEUM HOLDINGS) 10-cv-04577-MGC
LIMITED SECURITIES LITIGATION)
THIS DOCUMENT RELATES TO:) ECF Case
ALL ACTIONS)
)
X

DECLARATION OF KATHERINE H. WORDEN, ESQ. IN SUPPORT OF
ROBERT C. BRUCE'S MOTION TO DISMISS CONSOLIDATED CLASS ACTION
COMPLAINT

I, KATHERINE H. WORDEN, ESQ., declare as follows:

1. I am an associate with the firm of Debevoise & Plimpton LLP, which represents defendant Robert C. Bruce in this matter. I am admitted to practice before this Court. I submit this Declaration in support of Robert C. Bruce's Motion to Dismiss the Consolidated Class Action Complaint to provide the Court with copies of certain documents of which it may take judicial notice.

2. **Exhibit 1** is a true and accurate copy of the Consolidated Class Action Complaint filed in this action.

3. **Exhibit 2** is a true and accurate copy of China North East Petroleum Holdings Limited's ("China North") 8-K Report, filed November 24, 2009.

4. **Exhibit 3** is a true and accurate copy of China North's 2008 10-K Annual Report, filed March 30, 2009.

5. **Exhibit 4** is a true and accurate copy of China North's 8-K Report, filed May 27, 2010.

6. **Exhibit 5** is a true and accurate copy of the Public Company Accounting

Oversight (“PCAOB”) Board’s List of Registered Public Accounting Firms, dated December 18, 2008.

7. **Exhibit 6** is a true and accurate copy of the PCAOB’s inspection report of Jimmy C.H. Cheung & Co. dated October 1, 2009, PCAOB Release No. 104-2009-148.

* * * * *

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
March 22, 2010

/s/ Katherine H. Worden

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